

## **EXHIBIT C**

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March 15, 2016

### Via Email and First Class Mail

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Re: Adv. Pro. No. 10-04588 (SMB); *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Amy Pinto Lome Revocable Trust U/A/D 5/22/03, et al.*; In the United States Bankruptcy Court for the Southern District of New York.

Dear Counsel:

We received the March 14, 2016 Responses by Amy Pinto Lome Revocable Trust U/A/D 5/22/03, Amy Pinto Lome and Leonard Lome (collectively, the “Defendants”) to the Trustee’s First Set of Requests for Admission (the “Responses”). This letter represents an attempt by the Trustee to confer with you regarding deficiencies in the Reponses, pursuant to Judge Bernstein’s Chambers Rules and Rule 7007-1 of the Local Rules of the United States Bankruptcy Court of the Southern District of New York.

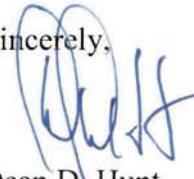
A number of Defendants’ Responses are either improperly qualified or completely non-responsive. Specifically, each set of Responses includes footnote 2, which provides that Defendant has limited certain Responses “only to transactions within the 2-year look-back of December 11, 2006 through December 11, 2008.” Some of Defendants’ Responses contain admissions, expressly limited by footnote 2. Other Responses contain no admission or denial, but simply a reference to footnote 2.

These limitations are improper. The Trustee is entitled to discover information relating to deposits into and withdrawals from the account at issue, over the life of the account. Accordingly, Defendants should admit or deny each of these requests without limitation.

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Before taking further action as provided for by Judge Bernstein's Chambers' Rules and by the Local Rules of the Bankruptcy Court, we are attempting to confer to resolve these discovery issues. Please amend Defendants' Responses to the Trustee's Requests for Admission by March 21, 2014.

If you would like to meet and confer on these discovery issues, please contact me or Rachel Smith at 713-646-1386.

Sincerely,  
  
Dean D. Hunt